

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MICHIGAN**

ROBIN ALTOBELLI, *et al.*,

Plaintiffs,

v.

GENERAL MOTORS LLC,

Defendant.

CASPER RANKIN,

Plaintiff,

v.

GENERAL MOTORS LLC,

Defendant.

SHAWN WALKER,

Plaintiff,

v.

GENERAL MOTORS LLC,

Defendant.

GEORGE ZAHARIUDAKIS,

Plaintiff,

v.

GENERAL MOTORS LLC,

Defendant.

Case No. 2:20-cv-13256-TGB-CI

CLASS ACTION

JURY TRIAL DEMANDED

Case No. 2:20-cv-13279-TGB-CI

CLASS ACTION

JURY TRIAL DEMANDED

Case No. 2:21-cv-10324-TGB-CI

CLASS ACTION

JURY TRIAL DEMANDED

Case No. 2:21-cv-10338-TGB-CI

CLASS ACTION

JURY TRIAL DEMANDED

MARY CARR, *et al.*,

Plaintiff,

v.

GENERAL MOTORS LLC,

Defendant.

WILLIAM KELSCH,

Plaintiff,

v.

GENERAL MOTORS LLC,

Defendant.

ANDRES TORRES, *et al.*,

Plaintiffs,

v.

GENERAL MOTORS LLC,

Defendant.

MICHELLE PANKOW, *et al.*,

Plaintiffs,

v.

GENERAL MOTORS LLC,

Defendant.

Case No. 2:21-cv-10565-TGB-CI

CLASS ACTION

JURY TRIAL DEMANDED

Case No. 2:21-cv-10803-TGB-CI

CLASS ACTION

JURY TRIAL DEMANDED

Case No. 2:21-cv-10888-TGB-CI

CLASS ACTION

JURY TRIAL DEMANDED

Case No. 2:21-cv-11099_____

CLASS ACTION

JURY TRIAL DEMANDED

**ORDER AND AGREED UPON STIPULATION FOR CONSOLIDATION
OF THE RELATED ACTIONS
AND SETTING SCHEDULE FOR THE FILING OF
A CONSOLIDATED COMPLAINT AND RESPONSIVE PLEADINGS**

WHEREAS, there are eight related putative class actions pending in this Court against Defendant General Motors LLC (“GM”): *Altobelli, et al. v. General Motors LLC*, No. 2:20-cv-13256-TGB-CI; *Rankin v. General Motors LLC*, No. 2:20-cv-13279-TGB-CI; *Walker v. General Motors LLC*, No. 2:21-cv-10324-TGB-CI; *Zahariudakis v. General Motors LLC*, No. 2:21-cv-10338-TGB-CI; *Carr, et al. v. General Motors LLC*, No. 2:21-cv-10565-TGB-CI; *Kelsch v. General Motors LLC*, No. 2:21-cv-10803-TGB-CI; *Torres, et al. v. General Motors LLC*, No. 2:21-cv-10888-TGB-CI; and *Pankow, et al. v. General Motors LLC*, No. 2:21-cv-11099-TGB-CI (together, the “Related Cases”).

WHEREAS, Plaintiffs in all of the Related Cases allege that 2017-2019 model year Chevrolet Bolt EVs manufactured by GM suffer from a battery defect that was not disclosed at the time of sale.

WHEREAS, the parties are currently unaware of any other related class action lawsuits pending in any other state or federal court that involve similar allegations about Chevrolet Bolt EVs.

WHEREAS, Plaintiffs, by and through their respective counsel, have conferred and agree that consolidation of the Related Cases is appropriate under FED. R. CIV. P. 42(a) and L.R. 42.1 because they involve common questions of law or

fact. Each of the Related Cases name a common defendant, arise from the same alleged battery defect, and assert similar claims on behalf of similar and/or overlapping putative classes.

WHEREAS, Plaintiffs' counsel have conferred with counsel for GM, who agree that these cases should be consolidated in this Court pursuant to FED. R. CIV. P. 42 and L.R. 42.1.

NOW THEREFORE, the parties through their respective counsel and subject to the Court's approval hereby stipulate that:

1. The above-captioned actions pending in this Court and any other action arising out of the same or similar operative facts now pending or hereafter filed in, removed to, or transferred to this Court shall be consolidated for all purposes pursuant to FED. R. CIV. P. 42(a) (the "Consolidated Action").

2. All papers filed in the Consolidated Action must be filed under Case No. 2:20-cv-13256-TGB-CI, the number assigned to the first-filed case, and must bear the following case name: *In re Chevrolet Bolt EV Battery Litigation*.

3. The case file for the Consolidated Action will be maintained under docket number 2:20-cv-13256-TGB-CI.

4. The Clerk will be directed to administratively close the following related cases: *Rankin v. General Motors LLC*, No. 2:20-cv-13279-TGB-CI; *Walker v. General Motors LLC*, No. 2:21-cv-10324-TGB-CI; *Zahariudakis v. General*

Motors LLC, No. 2:21-cv-10338-TGB-CI; *Carr, et al. v. General Motors LLC*, No. 2:21-cv-10565-TGB-CI; *Kelsch v. General Motors LLC*, No. 2:21-cv-10803-TGB-CI; *Torres, et al. v. General Motors LLC*, No. 2:21-cv-10888-TGB-CI; and *Pankow, et al. v. General Motors LLC*, No. 2:21-cv-11099-TGB-CI.

5. Any action subsequently filed, transferred, or removed to this Court that arises out of the same or similar operative facts as the Consolidated Action will be consolidated with it. The parties shall file a Notice of Related Cases whenever a case that should be consolidated into this action is filed in, or transferred to, this District.

6. The Court hereby sets the following deadlines for the consolidated case schedule:

- a. Plaintiffs' Deadline to File a Consolidated Complaint: 45 days following the Court's entry of the order appointing interim lead counsel.
- b. Defendants' Deadline to Respond to the Consolidated Complaint: 60 days following the filing of the Consolidated Complaint.
- c. Deadline for Fed. R. Civ. P. 26(f) Conference: 30 days after the resolution of GM's anticipated motion to dismiss the Consolidated Complaint.
- d. Initial Disclosures exchanged pursuant to Fed. R. Civ. P. 26(a)(1): 14 days after the Fed. R. Civ. P. 26(f) Conference.
- e. Combined Joint Status Report and Discovery Plan pursuant to Fed. R. Civ. P. 26(f): 21 days after the Fed. R. Civ. P. 26(f) Conference.

IT IS SO ORDERED on this 1st day of June, 2021.

/s/Terrence G. Berg
Hon. Terrence G. Berg
United States District Judge

Agreed to by:

By /s/ E. Powell Miller

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